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September 26, 2023

BY ECF

Hon. Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *People of the State of New York v. City of New York, et al.*
SDNY No. 20-cv-8924 (CM)(GWG) (consolidated actions)

Dear Judge McMahon:

We are counsel to the Police Benevolent Association (“PBA”). We write, further to Part I(D) of your Individual Practices, to request a one-week extension of the PBA’s time to submit papers in opposition to the proposed settlement in this matter.

The Court has requested a “deep dive” into numerous issues that it noted may present questions of first impression. (Dkt. 1108, pp. 1-2). PBA has been actively engaged with this matter but requires additional time to properly present these issues and integrate them with its underlying objections.

The current deadline is September 29, 2023, and we request an extension to October 6, 2023. There have been no previous requests for an extension of this deadline. To enable compliance with your Individual Practices, I sent an email request to counsel for all parties yesterday, more than 24 hours prior to the time of this submission, asking whether they consented to this request and 1) if so, whether they believed any other scheduling change was required or, 2) if not, providing a brief statement of their reasons for opposing.

Counsel for the Sergeant’s Benevolent Association, the Detectives’ Endowment Association and the City Defendants have advised that they take no position on the PBA’s extension request. We have yet to hear from counsel for plaintiffs. If the opposing parties want

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comparable extensions, that might require a short adjournment of the scheduled November 6 conference but, pending such a request, the requested extension does not affect any other scheduled dates.

Respectfully,

A handwritten signature in blue ink, appearing to read "T.A. Kissane". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Thomas A. Kissane

Copies To:

All counsel in Consolidated Actions (via ECF).